

**IN THE UNITED STATES BANKRUPTCY COURT FOR THE  
EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: FRANK TOROK, JOANN TOROK	:	No.: 16-16181-REF
	:	
Debtor.	:	CHAPTER 13
<hr/>		
FRANK TOROK, JOANN TOROK,	:	
	:	
Movant,	:	
	:	
v.	:	
	:	
ALLY BANK	:	
,	:	
	:	
	:	
Respondent.	:	

**CERTIFICATE OF NO RESPONSE**

1. On January 31, 2017, a motion to avoid lien was filed on behalf of the Debtor(s).
2. Amended notice of motion was filed on February 1, 2017.
3. As of March 1, 2017, no response has been filed by any party.

**WHEREFORE**, no objection being filed the Debtor(s), request the Court grant their motion to strip junior lien.

Date: 3.1.2017

Respectfully submitted,

/s/ Matthew Mugno  
Matthew Mugno, Esq.  
Attorney ID: 208328  
Caffese Law Firm  
803 Main Street  
Stroudsburg PA 18301  
Phone: 570.730.4670  
matt@jrcfirm.com